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Superfund Analytical Review and Oversight

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OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

OSWER DIRECTIVE #9240.0-03

MEMORANDUM

SUBJECT: Superfund Analytical Data Review and Oversight

FROM: Henry L. Longest II, Director
Office of Emergency and Remedial Response (OS-200)

TO: Waste Management Division Directors
Environmental Services Division Directors

PURPOSE:

This memorandum outlines procedures and responsibilities related to review and oversight of Superfund analytical data. It incorporates comments received on my draft memorandum of March 18, 1988.

BACKGROUND

At the February 1988 San Antonio meeting, a number of areas, including the data review process, were identified as providing opportunities for streamlining the RI/FS process. This memorandum responds to these opportunities by offering an alternative approach to data review that we believe will be successful in streamlining this important aspect of the RI/FS process. Some Regions have already begun to revise their approach to data review. Others are considering additional steps.

One further factor that has lead to the approach outlined in this memorandum is the need that many of us perceive to broaden the quality assurance oversight role in the Regions to address areas such as field sampling, responsible party and State lead sampling and analysis, and other data that does not go through the Contract Laboratory Program. In addition, there is a continuing need for closer "up front" involvement of the Environmental Services Divisions in development of Quality Assurance Project Plans (QAPjPs) in order to speed their accurate completion and approval.

I have previously requested that the Waste Management and Environmental Services Divisions in each Region work together to

determine how to best get work done that cuts across the divisions and who should do it. As a result, the process and organization used by each Region to review data vary. Also, data review is currently being conducted to different degrees across the Regions, although most are reviewing 100% of the Contract Laboratory Program data. The measure of success for this approach is an absence of roadblocks in the critical path for site cleanups.

There are several purposes for reviewing analytical data. For Contract Laboratory Program (CLP) Routine Analytical Services, review for compliance with contract requirements (e.g., completeness of the data package and technical quality assurance measures regarding instrument tuning, calibration, etc.) is done by EPA's Sample Management Office. Deficiencies are reported directly to laboratories for correction of any problems. This "Contract Compliance Screening (CCS)" process is being fully automated now that data are required to be delivered on diskette. This will facilitate self-inspection by laboratories and speed the CCS process so that results are available to the Regions in a matter of days.

This memorandum specifically addresses the review for both validity and useability, i.e., "data review," that is carried out by the Regions for all analytical data used to support Superfund decision-making.

OBJECTIVES

- To streamline analytical support for the RI/FS process and other Superfund programs by expediting data review and validation.

- To satisfy the Superfund quality assurance requirements of providing oversight of all Superfund data, including responsible party data, State lead data and non-Contract Laboratory Program federal lead data.

IMPLEMENTATION

In accordance with the Data Quality Objectives guidance, the data user is to establish the objectives for quality that the data must meet. Further, the user should determine the required level of assurance, i.e. data review, that the data generated actually meet the specified quality. The data review requirements should be stated in the project plan. The level of data review required may vary across projects and within projects based on the decisions to which the data will be applied, site characteristics, laboratory considerations and the nature of the data itself.

The actual review of the data should be done by the organization that will use the data. They are best able to set priorities

for the sites to be reviewed, and tailor the review to the objectives and use discussed above. In the majority of federal lead situations this will be the field contractor that requested the analysis. The Region may determine the Environmental Services Division/Environmental Services Assistance Team to be the most appropriate review source in some cases such as where there is a potential conflict of interest.

In all cases the data should be provided to the reviewer immediately upon receipt and should not be held awaiting additional information or corrections. Initial data packages may be incomplete in some cases, but often the incompleteness involves relatively minor items that do not effect the review or immediate use of the data. I recommend that all data packages be provided to the reviewing organization immediately, allowing the reviewer to decide whether to proceed to review and use the data. The Region should determine whom it will designate to most expeditiously communicate with the laboratories regarding any deliverable issues consistent with existing policy to maintain a reasonable number of designated contacts.

Regional quality assurance personnel should maintain significant responsibilities in this process. The Regional QA personnel should keep management informed of the status of the QA program to ensure that: decisions on the level of data review are appropriate; see that adequate staff resource levels and skills are provided; confirm that consistent and high quality reviews are carried out based on the EPA guidelines; and that required tracking, reporting and follow-up on data review results occurs. Environmental Services Assistance Team (ESAT) resources should be used to supplement these expanded oversight efforts as appropriate. This expanded oversight will facilitate maximum use of the increased sources of data review available through the Alternative Remedial Contracts and other contracts.

The March 20, 1986 OSWER Directive 9240.0-2 regarding Analytical Support for Superfund emphasized including all analytical services in a management system that provides documented adherence to appropriate quality assurance practices and procedures. Consistent with this, Regional/ESAT staff should perform similar oversight and audit on the non-CLP data related to federal, State and responsible party lead projects, and audit field sampling and analysis. They also should place high priority on the development of Quality Assurance Project Plans.

A Region may wish to make organizational assignments for data review and quality assurance that vary from this approach. However, it must meet the objectives for all sources of Superfund Data outlined in this memo. The Region is responsible for determining the degree to which data review will be done, the process and organization for conducting the reviews and the approach for

guidance, training, logistics, auditing and documentation. Each Region should develop an approach to implementation and establish a timetable that achieves these objectives as soon as possible, taking the Region's individual circumstances into account.

In the future, we will issue supplementary guidance to this memorandum. This guidance will be developed under the auspices of the Data Review/Data Useability Workgroup of the Analytical Services Advisory Committee. The guidance will address such areas as linking data quality objectives to the levels of data review. Guidance related to the expanded quality assurance program will also be developed. In addition, OERR Headquarters will review the Regions' implementation of this memorandum and the effectiveness of their data review programs as part of the Office of Solid Waste and Emergency Response (OSWER) Regional program evaluations.

Stephen Lingle, Director of the Hazardous Site Evaluation Division and Joan Barnes, Chief of the Analytical Operations Branch are prepared to discuss this with you further. My staff is available to assist with this effort upon your request.

Attachment

cc: Regional Superfund Remedial, Removal and Enforcement Branch Chiefs
Regional Quality Assurance Officers
Regional Data Review Branch Chiefs
Office of Waste Programs Enforcement
Quality Assurance Management Staff
Office of Regional Operations

bcc: Hazardous Site Control Division
Environmental Response Division
Duane Geuder, OERR
Hazardous Site Evaluation Division, Site Assessment Branch